

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

JOHN DOE,

Plaintiff,

v.

TRUSTEES OF DARTMOUTH COLLEGE,

Defendant.

Civil Action No. 22-CV-00018-LM

**(PROPOSED) PRELIMINARY INJUNCTION**

The Court, after hearing from the parties, has determined that plaintiff John Doe has proven a likelihood of success on the following claims: (1) breach of contract based on Dartmouth College's policies; (2) violation of Title IX of the Education Amendments Act of 1972; and (3) a violation of Title VI of the Civil Rights Act of 1964. The Court also finds that: John Doe will be irreparably harmed in the absence of an injunction; the balance of equities weighs in favor of a preliminary injunction; and a preliminary injunction is in the public interest.

Accordingly, defendant Trustees of Dartmouth College ("Defendant"), its agents, officials, employees, or anyone acting on its behalf, is hereby enjoined from enforcing its expulsion of John Doe pending a final resolution of this action. Defendant shall permit John Doe to register for and attend classes, to submit his application for Match, and to participate fully in campus activities. Defendant shall ensure that John Doe's absence from classes while his expulsion has been in effect thus far is not held against him in any way, including in his academic courses and with respect to his participation in campus activities.

John Doe is not required to pay any bond amount as security for this injunction because no amount is proper. In the event that Defendant is found to have been wrongly enjoined, any

costs and damages that it could conceivably incur as a result of its efforts to comply with this order would be adequately compensated for by the amount that John Doe will pay in tuition upon his return. Accordingly, no security is required under Rule 65(c).

Dated: \_\_\_\_\_, 2024

\_\_\_\_\_  
United States District Judge

### **CERTIFICATE OF SERVICE**

I, Leah Cole Durst, hereby certify that a copy of the foregoing document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Leah Cole Durst  
Leah Cole Durst